

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES SOCCER FEDERATION,  
INC.,

Plaintiff,

v.

UNITED STATES WOMEN'S NATIONAL  
SOCCER TEAM PLAYERS ASSOCIATION,

Defendant.

Case No. 1:16-cv-01923

Hon. Sharon Johnson Coleman

**UNITED STATES SOCCER FEDERATION, INC.'S  
UNOPPOSED MOTION TO SEAL**

Plaintiff United States Soccer Federation, Inc. ("US Soccer"), by its undersigned counsel, hereby moves the Court for an Order sealing the unredacted version of its Complaint and exhibits thereto (Docket No. 1) filed in this action (the "Unredacted Complaint") and states as follows:

1. US Soccer's Unredacted Complaint attaches several exhibits that contain private personal contact information of individual members of Defendant United States Women's National Soccer Team Players Association (the "Players Association") (the "Private Information"). Such information is wholly irrelevant to the merits of the dispute and the disposition of this action.

2. Local Rule 26.2 governs the sealing of confidential documents, and states that "[t]he court may for good cause shown enter an order directing that one or more documents be filed under seal."

3. US Soccer separately filed a redacted version of its Complaint (Docket No. 10), including narrowly tailored redactions designed to protect the Private Information as follows:

- a. Exhibit F, pp. 169-173;
- b. Exhibit H, p. 186;
- c. Exhibit K, p. 193;
- d. Exhibit L, pp. 196-197;
- e. Exhibit M, pp. 201, 203;
- f. Exhibit N, pp. 206-207, 209;
- g. Exhibit O, pp. 212-214, 216

4. Counsel for the Players Association supports the redactions and has consented to the sealing of the Unredacted Complaint.

5. The Seventh Circuit has stated that “narrow, specific requests [to seal] will be granted when based on articulated, reasonable concerns for confidentiality.” *KM Enterprises, Inc. v. Global Traffic Technologies, Inc.*, 725 F.3d 718, 734 (7th Cir. 2013) (granting motion to seal in full), citing *Baxter Int’l, Inc. v. Abbott Labs*, 297 F.3d 544, 546-47 (7th Cir. 2002).

6. Accordingly, in the interest of maintaining the confidentiality of the Private Information, and for good cause shown, US Soccer respectfully requests that this Court grant its motion and issue an Order sealing the Unredacted Complaint (Docket No. 1).

Dated: February 4, 2016

Respectfully submitted,

/s/ Matthew W. Walch

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2016, I electronically filed the foregoing **MOTION TO SEAL** with the Clerk of the Court using the CM/ECF system.. I further hereby certify that I caused to be served a copy of the foregoing **MOTION TO SEAL** via Federal Express overnight mail and email upon:

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I further hereby certify that I caused to be served a copy of the foregoing **MOTION TO SEAL** via hand delivery and email upon:

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Dated: February 4, 2016

By: /s/ Matthew W. Walch  
One of the Attorneys for Defendant  
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